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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

ROBERTA NUESTRO LAUSER,)	2:20-cv-02122-CKD
)	
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security, ¹)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension from November 15, 2021 through December 1, 2021 to respond to Plaintiff's Motion for Summary Judgment. Defendant's counsel will be out of the office on medical leave from Oct. 5, 2021-November 3, 2021. Defendant's counsel currently has five briefs due within the next month that she has to draft upon her return

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 and anticipates that she will have additional briefs due when she returns. There are no other
2 attorneys available to handle this brief while counsel is out of the office. As of September 14,
3 2021, counsel's office had 404 district court briefs due in the following sixty days and at least
4 300 of these were due within thirty days.

5 The parties further stipulate that the Court's Scheduling Order shall be modified
6 accordingly.

7
8
9 Respectfully submitted,

10 Law Office of Patricia L. McCabe

11 Dated: October 4, 2021

/s/ Patricia L. McCabe by Chantal R. Jenkins*

12 *As authorized via email on Oct. 4, 2021

13 Patricia L. McCabe

14 Attorney for Plaintiff

15 Dated: October 4, 2021

PHILLIP A. TALBERT

16 Acting United States Attorney

DEBORAH LEE STACHEL

17 Regional Chief Counsel, Region IX

18 Social Security Administration

19 By: /s/ Chantal R. Jenkins

20 CHANTAL R. JENKINS

21 Special Assistant United States Attorney

22 ORDER

23
24 APPROVED AND SO ORDERED.

25 Dated: October 5, 2021

26 

27 CAROLYN K. DELANEY

28 UNITED STATES MAGISTRATE JUDGE